## STATE OF SOUTH CAROLINA BEFORE THE PUBLIC SERVICE COMMISSION DOCKET NO. 2011-158-E

IN THE MATTER OF:	)
	)
Application of Duke Energy Corporation	)
And Progress Energy, Inc. on Behalf of	)
Their Electric Utility Subsidiaries Duke	)
Energy Carolinas, LLC and Progress Energy	)
Carolinas, Inc. to Engage in a Business	í
Combination Transaction	í

## MOTION FOR ADMISSION PRO HAC VICE

The International Brotherhood of Electrical Workers ("IBEW"), by and through undersigned counsel, pursuant to SCACR 404, and as set forth in the attached Verified Application for Admission Pro Hac Vice in the State of South Carolina, hereby moves the Commission to permit Jonathan D. Newman to practice pro hac vice before the Commission in the above-captioned matter. In support of this Motion, the IBEW states as follows:

- 1. The IBEW has filed, concurrent with this Motion, a Motion to Intervene in the above-caption proceeding.
- 2. The attached Verified Application for Admission Pro Hac Vice in the State of South Carolina is in accordance with SCACR 404, and is on the form prescribed by the South Carolina Judicial Department.
- 3. In accordance with SCACR 404, a copy of the attached Verified Application for Admission Pro Hac Vice in the State of South Carolina is

being provided to the South Carolina Supreme Court Office of Bar Admissions accompanied by a \$250 fee.

WHEREFORE, the IBEW respectfully requests that the Commission enter an order admitting Mr. Newman to practice before the Commission for the purpose of appearing on behalf of the IBEW in the above-captioned proceeding.

s/D. Peters Wilborn, Jr.

D. Peters Wilborn, Jr.
Derfner, Altman & Wilborn
P.O. Box 600
Charleston, SC 29402
(843) 723-9804 (P)
(843) 723-7446 (F)
pwilborn@dawlegal.com

Attorney for International Brotherhood of Electrical Workers

August  $\bigcap$ , 2011

## CERTIFICATE OF SERVICE

The undersigned does hereby certify that on August 17, 2011, he has caused the foregoing Motion for Admission Pro Hac Vice on behalf of the International Brotherhood of Electrical Workers to be served by U.S. mail, regular mail, with sufficient postage affixed thereto and return address clearly marked on the following parties:

Courtney D. Edwards Nanette S. Edwards Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201

Frank R. Ellerbe, III Robinson, McFadden & Moore, P.C. PO Box 944 Columbia, SC 29202-0944

Garrett A. Stone Michael K. Lavanga Brickfield, Burchette, Ritts & Stone, PC 1025 Thomas Jefferson St., N.W. Eighth Floor, West Tower Washington, D.C. 20007

James N. Horwood Pablo O. Nuesch Peter J. Hopkins Spiegel & McDiarmid 1333 New Hampshire Ave., N.W. Washington, D.C. 20036

Kodwo Ghartey-Tagoe Duke Energy Carolinas, LLC PO Box 1006/EC03T Charlotte, N.C. 28201 Len S. Anthony Progress Energy Carolinas, Inc. PO Box 1551-MC 17A4 Raleigh, N.C. 27602

Robert R. Smith, II Moore & Van Allen, PLLC 100 North Tyron St., Suite 4700 Charlotte, N.C. 28202

Scott Elliott Elliott & Elliott, P.A. 1508 Lady Street Columbia, SC 29201

s/D. Peters Wilborn, Jr.

D. Peters Wilborn, Jr.